

April 30, 2003

Ms. Barbara Robinson
USDA/AMS/NOP
1400 Independence Ave, SW, Room 2510
Washington, DC, 20090

Dear Barbara:

**Re: Docket Number 02-03 205.603. Synthetic Substances Allowed for Use in
organic Livestock Production – DL Methionine**

I am writing, not as a nutritionist, but as a Board Certified Poultry Veterinarian. Methionine is an essential nutrient for chickens, but its importance goes beyond this fact. Having over 30 years experience with chickens, I have seen meat type birds raised before DL Methionine was introduced and that was not a pleasant experience. Poor feathering, stunted growth, feather picking and eventual cannibalism were all too common. Typically at that time, chickens were raised on more than one square foot per bird. Egg laying birds would experience decreased egg production, poor feathering and associated cannibalism. We refer to this situation in this day and age as animal welfare problems.

While increasing the general level of protein does offer some sparing effect on the nutritional aspect, please rest assured that this solution comes with other issues. Increased protein intake cause accelerated metabolism and body temperature causing heightened bird activity, which leads to hyperexcitability, flightiness and many of the issues mentioned above. These behavior patterns are also animal welfare issues, not to mention decline in bird performance. I might also add that protein nutrition is already a complex entity in organic chickens, as we are forbidden the use of mammalian animal protein. Additionally food animal production is already under added pressure to reduce nitrogen (and phosphorous) intake and excretion for environmental reasons. Other alternatives are just not adequate, but I refer to you to letters from qualified nutritionists on this matter, as they are the experts on nutrient formulation.

For these reasons, and as I have previously commented, I am asking that use of DL Methionine in feed for certified organic chickens be continued beyond the 3 year limit that is to expire in 2005. There is no substitute for this essential nutrient.

I know you have comments on record from Novus, Inc and from quailed poultry nutritionists on the technical merits of this position and I hope the NOSB realizes the importance and significance of their position.

I will be unable to attend the NOSB meeting in Austin, but trust that this letter will be read and will be part of the submission docket on this matter. If you have further questions, please contact me.

Sincerely,

Spangler Klopp, DVM, Dpl ACPV
Corporate Veterinarian

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